

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re)	
)	Chapter 15
)	
Crédito Real, S.A.B. de C.V., SOFOM, E.N.R. ¹)	Case No. 22-10630 (JTD)
)	
Debtor in a Foreign Proceeding.)	
)	

**NOTICE OF FILING AND HEARING ON PETITION UNDER CHAPTER 15
OF THE UNITED STATES BANKRUPTCY CODE AND
MOTION FOR RELATED RELIEF**

PLEASE TAKE NOTICE that on July 14, 2022, Robert Wagstaff (the “**Petitioner**” or the “**Foreign Representative**”), duly appointed as the foreign representative by Mr. Fernando Alonso-de-Florida Rivero, the court-appointed liquidator (*Liquidator Judicial*) (the “**Mexican Liquidator**”)² of the Special Expedited Commercial proceeding (*Via Sumaria Especial Mercantil*) for the dissolution and liquidation (the “**Mexican Liquidation Proceeding**”) of Crédito Real, S.A.B. de C.V., SOFOM, E.N.R. (the “**Chapter 15 Debtor**”) pending in the 52nd Civil State Court of Mexico City (the “**Mexican Court**”) pursuant to articles 229, 232, 233, 236, and others of the *Ley General de Sociedades Mercantiles*, as originally published in the *Diario Oficial de la Federación* on August 4, 1934 and last revised on June 14, 2018 (as amended, the “**Mexican Corporations Law**”), commenced the above-captioned cases under chapter 15 of the Bankruptcy Code with the United States Bankruptcy Court for the District of Delaware (the “**Bankruptcy Court**”) in furtherance of the Mexican Liquidation Proceeding.

¹ The last four identifying digits of the tax number and the jurisdiction in which the Chapter 15 Debtor pays taxes is Mexico – 6815. The Chapter 15 Debtor’s corporate headquarters is located at Avenida Insurgentes Sur No. 730, 20th Floor, Colonia del Valle Norte, Alcaldía Benito Juárez, 03103, Mexico City, Mexico.

² On July 13, 2022, the Mexican Court appointed the Mexican Liquidator on a final basis.

PLEASE TAKE FURTHER NOTICE that, among other things, the Petitioner seeks the entry of an order: (i) granting recognition of the Mexican Liquidation Proceeding pursuant to section 1517 of the Bankruptcy Code as the “foreign main proceeding” (as defined in section 1502(4) of the Bankruptcy Code) of the Chapter 15 Debtor, and all relief included therewith as provided in section 1520 of the Bankruptcy Code; (ii) recognizing the Petitioner as the “foreign representative” (as defined in section 101(24) of the Bankruptcy Code) of the Mexican Liquidation Proceeding for the Chapter 15 Debtor for purposes of this Chapter 15 Case; and (iii) granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that the Bankruptcy Court has scheduled a hearing (the “**Recognition Hearing**”) in the United States Bankruptcy Court for the District of Delaware, 824 Market Street North, 5th Floor, Wilmington, Delaware 19081 to consider the relief requested in the Petitions for **September 19, 2022 at 10:00 a.m. (ET)** according to such procedures as shall be set forth in the agenda to be filed by the Petitioner no later than 12:00 p.m. (ET) two (2) business days before the Recognition Hearing.

PLEASE TAKE FURTHER NOTICE that copies of the Petitions and all accompanying documentation are available to parties in interest on the Bankruptcy Court’s Electronic Case Filing System, which can be accessed from the Bankruptcy Court’s website at <http://www.deb.uscourts.gov> (a PACER login and password are required to retrieve a document); or upon written request to the Petitioner’s counsel (including by e-mail) addressed to:

Philip M. Abelson
1221 Avenue of the Americas
New York, NY
Telephone: (212) 819-8200
Email: philip.abelson@whitecase.com

or John H. Knight
920 North King Street
Wilmington, DE 19801
Telephone: (302) 651-7700
Email: knight@rlf.com

PLEASE TAKE FURTHER NOTICE that any party in interest wishing to submit a response or objection to the Petitions, or the relief requested therein, must do so in writing and in accordance with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the Local Rules for the United States Bankruptcy Court for the District of Delaware, setting forth the basis therefor. Any such response or objection must be filed with the Office of the Clerk of the Court, 824 N. Market Street, Third Floor, Wilmington, Delaware 19801, and served upon the following **so as to be received on August 26, 2022 at 4:00 p.m. (ET)**: (i) White & Case LLP, 1221 Avenue of the Americas, New York, NY 10020 (Attn: John K. Cunningham (jcunningham@whitecase.com); J. Christopher Shore (cshore@whitecase.com); Philip M. Abelson (philip.abelson@whitecase.com)), and 200 South Biscayne Boulevard, Suite 4900 Miami, FL 33131 (Attn: Richard S. Kebrdle (rkebrdle@whitecase.com); Jason N. Zakia (jzakia@whitecase); and Jesse Green (jgreen@whitecase.com)) as counsel to the Petitioner; (ii) Richards Layton & Finger P.A., (Attn: John H. Knight (knight@rlf.com)) as local counsel to the Petitioner; (iii) Crédito Real, S.A.B. de C.V., SOFOM, E.N.R. is Avenida Insurgentes Sur No. 730, 20th Floor, Colonia del Valle Norte, Alcaldía Benito Juárez, 03103, Mexico City, Mexico (Attn: Legal Department c/o Juan Pablo Estrada (jpestrada@lmye.mx)); (iv) Riveron Consulting, LLC, 600 Brickell Avenue, Suite 2550 Miami, FL 33131 (Attn: Robert Wagstaff (robert.wagstaff@riveron.com)) as Foreign Representative and (v) the Office of the United States Trustee for the District of Delaware, 844 King Street Suite 2207 Lockbox 35 Wilmington, DE 19801 (Attn: David Burchbinder (David.l.burchbinder@usdoj.gov); Timothy J. Fox Jr. (Timothy.Fox@usdoj.gov)).

PLEASE TAKE FURTHER NOTICE that all parties in interest opposed to the Petitions or the request for relief contained therein must appear at the Recognition Hearing at the time and place set forth above.

PLEASE TAKE FURTHER NOTICE that, at the Recognition Hearing, the Court may order the scheduling of a case management conference to consider the efficient administration of the case.

PLEASE TAKE FURTHER NOTICE that if no response or objection is timely filed and served as provided above, the Court may grant the relief requested in the Petitions without further notice.

PLEASE TAKE FURTHER NOTICE that the Recognition Hearing may be adjourned from time to time without further notice other than an announcement in open court, or a notice of adjournment filed with the Court, of the adjourned date or dates at the hearing or any other further adjourned hearing.

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Dated: August 12, 2022

Respectfully submitted,

/s/ Amanda R. Steele

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